

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,  
Debtors.\*

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

**MOTION FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENTS**

**COMES NOW** the Lawful Constitutional Coalition (the LCDC")<sup>1</sup>, through the undersigned attorneys and respectfully states and prays as follows:

Today, the LCDC filed the *Joinder of the Lawful Constitutional Debt Coalition to the Memorandum of Law of the Oversight Board in Support of its Request for Rulings regarding Act 53-21* that includes two (2) Exhibits which are in the Spanish language. The official translation of said Exhibits into the English language was not available before the filing. The certified translation of said Exhibits will be submitted as soon as it is received, which should not exceed a

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\* The Debtors in these Title III cases, along with each Debtor's respective bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>1</sup> The members of the LCDC and their respective holdings are set forth in the *Thirteenth Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019* (Dkt. No. 19128).

period of around nine (9) days, that is, by approximately November 24, 2021. We respectfully request a leave from this Honorable Court to accept the aforementioned Exhibits in the Spanish language while the translations are received. Neither this Honorable Court nor the parties will be prejudiced by the filing of the Exhibits in Spanish.

**WHOREFORE**, it is respectfully requested from this Honorable Court to grant our request to file in Spanish the Exhibits that accompany the *Joinder of the Lawful Constitutional Debt Coalition to the Memorandum of Law of the Oversight Board in Support of its Request for Rulings regarding Act 53-21*.

**RESPECTFULLY SUBMITTED.**

DATED: November 15, 2021

REICHARD & ESCALERA

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By : \_\_\_\_\_

/s/ Rafael Escalera

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**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

*/s/ Carlos R. Rivera-Ortiz*

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